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PROPOSED COUNSEL FOR
THE CHAPTER 7 TRUSTEE

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE: § **CASE NO. 24-50224 (MMP)**
GENESIS NETWORKS TELECOM §
SERVICES, LLC, §
§
§
Debtor. §
§
Chapter 7 §

**CHAPTER 7 TRUSTEE'S JOINDER TO MOTION OF FEDEX SUPPLY CHAIN
LOGISTICS & ELECTRONICS, INC. FOR ORDER DIRECTING RULE 2004
EXAMINATIONS OF (I) THE DEBTOR, (II) ENDEAVOR MANAGED SERVICES,
INC., (III) SYMBIONT VENTURES, LLC F/K/A GOODMAN INVESTMENT
HOLDINGS LLC AND (IV) JAMES GOODMAN**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Laurie Dahl Rea (“Trustee”), solely in her capacity as the duly-appointed chapter 7 trustee of Genesis Networks Telecom Services, LLC, and filed this joinder (the “Joinder”) to the *Motion of FedEx Supply Chain Logistics & Electronics, Inc. for Order Directing Rule 2004 Examinations of (I) the Debtor, (II) Endeavor Managed Services, Inc., (III) Symbiont Ventures, LLC f/k/a Goodman Investment Holdings, LLC and (IV) John Goodman* [Docket No. 63] (the “Motion”) in support of which the Trustee would respectfully show as follows:

1. The Trustee hereby joins in the Motion for substantially the reasons as set out in the Motion. The Examinees (as defined in the Motion) are all relevant entities and persons of interest to this case. The Examinees appear to be either the direct recipients or the ultimate beneficiaries of transfer of property of the Debtor.

2. Accordingly, for the reasons set out in the Motion and this Joinder, the Motion should be granted.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully requests that the Court enter an order: (i) granting the Motion; (ii) ordering the Rule 2004 Examinations; (iii) ordering the Examinees to fully produce responsive documents to the requests for production attached to the Motion within thirty (30) days; and (iv) granting all such other and further relief as may be appropriate.

Dated: August 7, 2024.

Respectfully submitted,

/s/ Shannon S. Thomas
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2024, a true and correct copy of the foregoing document was electronically filed in the above captioned case with the Clerk of the United States Bankruptcy Court by using the CM/ECF system and a copy was served via the Court's CM/ECF Electronic Notice, where available, and via US Mail First Class upon the parties listed below.

Symbiont Ventures, LLC 1354 N Loop 1604 E San Antonio, TX 78232	Symbiont Ventures, LLC c/o Capitol Corporate Services, Inc., Registered Agent 1501 S Mopac Expy, Ste. 220 Austin, TX 78746
Endeavor Managed Services, Inc. 1354 N Loop 1604 E San Antonio, TX 78232	Endeavor Managed Services, Inc. c/o Incorporating Services, Ltd. 3610-2 N. Josey, Suite 223 Carrollton, TX 75007
James Goodman c/o Randall A. Pulman PULMAN CAPPUCCIO & PULLEN, LLP 2161 NW Military Highway, Suite 400 San Antonio, Texas 78213	Genesis Networks Telecom Services, LLC c/o Martin Seidler 11107 Wurzbach, Suite 504 One Elm Place San Antonio, TX 78230

/s/ Shannon S. Thomas
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